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Mr. Brian Power
Area Environmental Manager
Republic Services, Inc.
13570 St. Charles Rock Road
Bridgeton, Missouri 63044

Re: EPA Approval with Conditions of the Gamma Cone Penetration Test Work Plan,
Revision 1, September 10, 2013

Dear Mr. Power:

The U.S. Environmental Protection Agency has reviewed the subject document and the associated Gamma Cone Penetration Test (GCPT) health and safety plan. The EPA requires health and safety plans whenever field work is done under agency oversight; however, the agency does not approve health and safety plans.

The agency considered the Missouri Department of Natural Resource's comments enclosed with this letter. In the interest of expediting performance of this work, the agency is not addressing the issues of radiological background levels, the replacement of monitoring well D-14 or the definition of radiologically impacted material (RIM) within the context of the North Quarry Contingency Plan. The 5 pCi/g plus background cleanup standard has been used extensively at other radiological sites.

The agency finds the revised work plan to be acceptable and hereby approves it with the conditions below, which are incorporated from the comments in the enclosed MDNR letter. Provide the agency a revised final document incorporating these changes within seven (7) days of your receipt of this letter.

Condition #8, Response to Comment 17: In addition to using PVC-38 and PVC-28 to correlate the readings obtained by the GCPT sensor, a location with a gamma response similar to the RIM threshold of 5 pCi/g plus background should be chosen. MDNR's suggestion in its letter to the agency of September 18, 2013, to use PVC-36 for this purpose is acceptable.

Condition #9, Response to Comment 20: There should be no visible dust emissions from vegetation-clearing activities, including dust that may be generated from the ground surface due to vegetation-clearing equipment.

Condition #10, Response to Comment 25: Republic may abandon sounding holes by filling them from the surface with short hydrated lifts of bentonite pellets. Per MDNR's letter referenced above, no variance will be required from Missouri Well Construction Rules. Bentonite-coated gravel shall not be used to abandon these holes, nor shall any materials from equipment decontamination be placed in these holes as suggested in Section 3.4.2.1 of the revised work plan.

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Approval of this work plan does not constitute approval of the September 9, 2013, memorandum from Paul Rosasco to Dan Feezor titled "Definition of Radiologically-Impacted Material (RIM)" which attempts to provide information on the effects of a subsurface smoldering event on RIM.

The agency expects Republic to begin work on the Phase 2 Investigation Work Plan to encompass the collection of core samples before or concurrent with the field work for the Phase 1 GCPT work so that the core samples can be collected as soon as possible after the GCPT work is complete. The Phase 2 work plan shall incorporate your responses to the August 20, 2013, comments to the extent those comments apply to the Phase 2 work.

We expect Republic to begin mobilizing so that field work begins no later than October 10, 2013. Please provide the agency with one week's notice prior to beginning field work so agency personnel can be on-site to observe the work.

Sincerely,

Cecilia Tapia
Director
Superfund Division

Enclosures

cc: Leanne Tippet-Mosby, MDNR
Jonathan Garoutte, MDHSS
Joseph Bindbeutel, Missouri Attorney General's Office